

REMARKS/ARGUMENTS

The Office Action mailed January 27, 2005 has been carefully considered.

Reconsideration in view of the following remarks is respectfully requested.

Claims 7, 17, and 22 have been amended to further particularly point out and distinctly claim the subject matter regarded as the invention. Support for these changes may be found in the specification, page 12, lines 12-15. The text of claims 8-12, 18-21, and 23-31 is unchanged, but their meaning is changed because they depend from amended claims. Claims 9-12, 18-21, and 24-31 have been amended to correct minor editorial matters. No new matter has been added.

The 35 U.S.C. § 103 Rejection

Claims 7-12 and 17-31 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Yalcinalp (USP 6,507,857) in view of Lipkin (USP 6,721,747), among which claims 7, 17, and 22 are independent claims. This rejection is respectfully traversed.

According to the Manual of Patent Examining Procedure (M.P.E.P.),

To establish a *prima facie* case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure.¹

Specifically, the Office Action contends that the elements of the presently claimed invention are disclosed in Yalcinalp except that Yalcinalp does not teach "storing the persisted data components in one or more form data tables and accessing a database if necessary". The

Office Action further contends that “Lipkin teaches storing the persisted data components in one or more form data tables (col. 12, line 6-col. 13, line 5/col. 28, lines 31-38 and col. 31, line 65-col. 32, line 12) and accessing a database if necessary (Abstract/col. 12, lines 6-64 and col. 19, line 66-col. 20, line 65)” and that it would be obvious to one having ordinary skill in the art at the time of the invention to “include the feature from Lipkin in the system of Yalcinalp because Lipkin’s teaching would have provided the capability for efficiently managing and retrieving information over a network.” The Applicants respectfully disagree for the reasons, among others, set forth below.

1) Neither Yalcinalp nor Lipkin teaches or suggests “accepting a task form from the user, the task form containing data tags and process tags, the data tags identifying a plurality of first data components and a plurality of second data components, wherein the plurality of first data components consist of data that will be kept in a database table after the task form is filled out and submitted by the user, and the plurality of second data components consists of data that is not modifiable by the user when the user fills out the task form.”

Claims 7, 17, and 22 have been amended to specifically set forth that the first data components constitute data that will be kept in the database tables when the task form is filled out and submitted by the user, and that the second data components are not modifiable by the user once the task form has been filled out.

Neither Yalcinalp nor Lipkin teach having first data components that are kept in the database tables or second data components that are not user modifiable. As stated before, there is no reason for Yalcinalp to consider these things, as the data inside the document is not relevant to Yalcinalp. Rather, it is the **transformation** of the document itself that is sought. Yalcinalp simply does not care about the substance of the content in the document, and thus does not care

¹ M.P.E.P § 2143.

whether or not it is in a task form, kept in a database table, or whether the data components are not modifiable.

Nevertheless, the style sheets identified in the Office Action as teaching data kept in a database table are in fact, not the same data as defined by amended Claims 7, 17, and 22 as they do not constitute data that will be kept in a database table when the task form is filled out and submitted by the user. Likewise, the transform document identified in the Office Action as teaching non-modifiable data components is, in fact, not the same as the data component defined by amended Claims 7, 17, and 22 since it the data components that are modifiable by the user.

Therefore, neither Yalcinalp nor Lipkin teaches or suggests “accepting a task form from the user, the task form containing data tags and process tags, the data tags identifying a plurality of first data components and a plurality of second data components, wherein the plurality of first data components consist of data that will be kept in a database table after the task form is filled out and submitted by the user, and the plurality of second data components consist of data that is not modifiable by the user when the user fills out the task form” as claimed in amended Claims 7, 17, and 22.

2) The Office Action incorrectly interpreted the teachings of Yalcinalp.

The Office Action states that Yalcinalp teaches “accepting a task form from the user, the task form containing data tags and process tags (*e.g. receiving a request for an input document ... having tags associated with the input document, wherein one of the tags presents an external component, processing tags; col. 2, lines 23-48*)”. The Office Action omitted important words in the quotation above. As the quotation is read, one is lead to believe that Yalcinalp teaches a request document having tags.

However, upon further reading of the prior art reference, the citation provided in the Office Action actually reads: “a method of creating a transform document using a style sheet comprises the steps of receiving a request for an input document, **retrieving the style sheet**, having tags, associated with the input document, wherein one of the tags represents an external component, processing the tags.” (Col. 2, lines 25-28). Yalcinalp specifically states that the style sheets, and not the input document, have tags associated with the input document.

Applicant respectfully submits that the Office Action’s interpretation of the prior art is incorrect. The Office Action incorrectly equates the input document of Yalcinalp with the task form of amended Claims 7, 17, and 22. Applicant has shown that the input document in Yalcinalp clearly does not have tags. Therefore, Yalcinalp does not teach or suggest “accepting a task form from the user, said task form containing data tags and process tags” as provided for in amended Claims 7, 17, and 22.

3) Neither Yalcinalp nor Lipkin teach “executing the process tags to create an XML document.”

Yalcinalp provides for “the ability to create a style sheet that is application independent and to provide a means for creating application dependent functions within that style sheet.” (Col. 2, lines 10-12). Thus, Yalcinalp is solely concerned with merely extending an XSL style sheet to include components that allow for the transformation of content in a document. The XSL style sheets are extended by **transforming** a target XML document and not **creating or generating** an XML document as claimed in amended Claims 7, 17, and 22. Thus, the combination of Yalcinalp and Lipkin do not teach “executing the process tags to create an XML document.”

- 4) **Neither Yalcinalp nor Lipkin teaches “the data tags identifying a plurality of first data components and a plurality of second data components.”**

The Office Action alleges that Yalcinalp teaches the above limitation and cites the style sheets and transform document of Yalcinalp in col. 5, lines 37-50 as allegedly providing evidence of this teaching. However, upon further reading of the citation, Yalcinalp actually teaches that the "XSLT processor 205 then retrieves the appropriate style sheet associated with the document requested in order to process and generate a transform document to present to the user." (Col. 5, lines 47-50). The transform document is **generated** by the XSLT processor but **not identified in the data tags** as provided for in amended Claims 7, 17, and 22.

Thus, while Yalcinalp may teach the use of style sheets and transform documents, it does not teach tags identifying the transform document. Hence, it fails to teach "the data tags identifying a plurality of first data components and a plurality of second data components" as claimed in amended Claims 7, 17, and 22.

Accordingly, since the prior art references do not teach or suggest all the claim limitations, it can not be said to anticipate the claimed invention. It is respectfully requested that this rejection be withdrawn.

Dependent Claims

As to dependent claims 8-12, 18-21, and 23-31, the argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

Request For Interview

Applicant's Attorney respectfully requests an interview with the Examiner Nguyen and Examiner Nguyen's supervisor, Examiner Joseph H. Field, before the next Office Action to expedite the prosecution of this application. This application has been pending since March 9, 2000 and we feel that an interview would be helpful at this juncture.

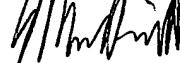
Conclusion

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

THELEN REID & PRIEST, LLP



Marc Hanish
Reg. No. 42,626

Dated: 4/20/05
Thelen Reid & Priest LLP
P.O. Box 640640
San Jose, CA 95164-0640
Tel. (408) 292-5800
Fax. (408) 287-8040